

Jeopardy Assessment
Kohler Golf Course, Sheboygan County
Proposed Incidental Take Permit #307
for Sand Reedgrass

Background

Project Information

The Kohler Company proposes to develop an 18-hole public golf course, a clubhouse, and support amenities on approximately 250 acres of private land owned by Kohler. This property is located in the City of Sheboygan, Sheboygan County, Wisconsin. Access to the property is proposed through an easement or a land exchange on the adjacent State Park property to the south.

No work will begin on lands subject to an easement across the Kohler-Andrae State Park or a land exchange involving park lands and property presently owned by the Kohler Company until the land transactions are finalized and recorded.

Species Information

Sand Reedgrass (*Calamovilfa longifolia* var. *magna*), a Wisconsin Threatened plant, is found on Lake Michigan sand dunes. Blooming occurs early July through late September; fruiting occurs early August through late September. The optimal identification period for this species is early July through late September.

Conservation Measures

A total of approximately 8,143 sand reedgrass plants have been recorded within the planned limits of disturbance (compared to an estimated total number of over 121,000 plants in the immediate vicinity, on State-owned land). The proposed maintenance facility was relocated to the north to minimize sand reedgrass impacts. The relocation avoided the impact to approximately 0.53 acres of habitat and 11,857 additional plants. Relocating the entrance road further to the west to avoid and/or minimize impacts was also investigated but not implemented as it would result in impacts to wetlands and/or floodplain.

Kohler investigated several mitigation options to offset the impact to sand reedgrass including:

1. Locating a suitable sand reedgrass replacement site in the Kohler-Andrae State Park, of equivalent areal extent (0.38 acres) to offset sand reedgrass impacts. Replacement includes transplanting and/or seed installation.
2. Improve existing sand reedgrass habitat on Kohler-Andrae State Park removing invasive plant species (i.e., spotted knapweed).
3. Protect existing sand reedgrass on Kohler-Andrae State Park in areas of high public use and improve public access in sensitive habitats.

After consultation with WDNR staff regarding potential mitigation options, it was determined that extensive populations of sand reedgrass currently exist throughout the State Park and an invasive species management plan is already being implemented for sand reedgrass habitat. WDNR also indicated that the

use of cordwalk has been utilized successfully in the State Park to protect rare plants by directing visitors to use the cordwalk, thereby avoiding erosion and disruption to sensitive habitats.

Based upon these discussions, protection of existing sand reedgrass populations within the State Park via installation of additional cordwalk was determined to be the preferred mitigation approach. The existing cordwalk in the State Park primarily runs parallel to the shoreline with limited access to Lake Michigan.

The installation of approximately 1,000 lineal feet of new cordwalk to connect the existing cordwalks to the Lake Michigan shoreline would minimize erosion and disruption to the existing sand reedgrass populations. The new cordwalk is anticipated to protect approximately 6% (9 acres) of scattered sand reedgrass populations in the State Natural Area to offset the taking of approximately 6% (0.38 acres) of the more dense sand reedgrass population near the state park entrance.

Jeopardy Assessment

The proposed activity will minimize and mitigate impacts to sand reedgrass and as a result, we anticipate that take of this species will be low. The department has determined that the proposed activity is not likely to appreciably reduce the likelihood of the survival or recovery of sand reedgrass within the state, the whole plant-animal community of which it is a part or the habitat that is critical to its existence.